

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to: *All Actions*

**DECLARATION OF ROBERT T. HAEFELE TRANSMITTING EVIDENCE
IN SUPPORT OF PLAINTIFFS' REPLY MEMORANDUM OF LAW IN FURTHER
SUPPORT OF PLAINTIFFS' *DAUBERT* MOTION TO EXCLUDE THE PROPOSED
TESTIMONY OF DEFENDANTS' PROPOSED EXPERTS, JONATHAN BENTHALL,
CHARLES ("CHAS.") W. FREEMAN, JONATHAN MARKS, AND JOHN SIDEL**

I, Robert T. Haeefe, pursuant to 28 U.S.C. §1746, declare, under penalty of perjury, that the following statements are true and correct:

1. I am an attorney admitted to practice in the above-captioned matter, a member of the Plaintiffs' Executive Committees in this MDL, and associated with the law firm Motley Rice LLC, counsel for plaintiffs in this MDL.

2. I submit this Declaration to identify and transmit into evidence the exhibits referenced in Plaintiffs' Reply Memorandum of Law in Further Support of Plaintiffs' *Daubert* Motion to Exclude the Proposed Testimony of Defendants' Proposed Experts, Jonathan Benthall, Charles W. Freeman, Jonathan Marks, and John Sidel.

3. Attached hereto are true and correct copies of the Exhibits identified below.

4. Exhibit AA is excerpted pages from the Deposition of Jonathan Benthall, taken on July 20, 2021.

5. Exhibit AB is a copy of *Terrorist Financing Risk Assessment Guidance*, Financial Action Task Force, July 2019.

6. Exhibit AC is excerpted pages from the Deposition of John Sidel, taken on April 27, 2021.

7. Exhibit AD is excerpted pages from the Deposition of Jonathan Marks, taken on July 22, 2021.

8. Exhibit AE is a copy of the *Testimony of Stuart Levey, Under Secretary Office of Terrorism and Financial Intelligence U.S. Department of the Treasury, Before the House Financial Services Subcommittee on Oversight and Investigations and the House International Relations Subcommittee on International Terrorism and Nonproliferation*, 109th Cong., First Session (May 4, 2005).

9. Exhibit AF is the Expert Report of Victor D. Comras, dated October 29, 2020.

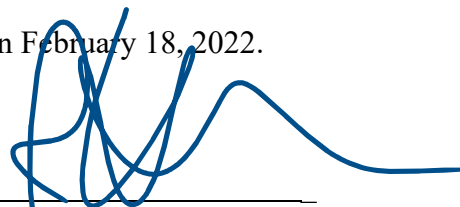
10. Exhibit AG is excerpted pages from the Deposition of Charles W. Freeman, taken on April 6, 2021.

11. Exhibit AH is a copy of *Monograph on Terrorist Financing*, National Commission on Terrorist Attacks Upon the United States by John Roth, Douglas Greenburg, Serena Wille.

12. Exhibit AI is a copy of *International Standards on Combating Money Laundering and the Financing of Terrorism and Proliferation*, Financial Action Task Force, October 2021.

13. Exhibit AJ is Exhibit 549 to the Deposition of Charles W. Freeman (MEPC 1997 Contributions).

Executed in Mount Pleasant, South Carolina, on February 18, 2022.



Robert T. Haeefe, Esq.